

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MOUNTAIN EXPRESS OIL COMPANY, *et al.*,
Debtors.¹

)
) Chapter 11
)
) Case No. 23-90147 (DRJ)
)
) (Jointly Administered)
)
) **Re: Docket No. 13**

**AMENDED NOTICE OF APPEARANCE
AND REQUEST FOR SERVICE OF NOTICES AND PLEADINGS**

PLEASE TAKE NOTICE that the below named attorneys hereby file their amended appearance as attorneys in the above-referenced chapter 11 cases on behalf of the Oak Street Real Estate Capital, LLC (“Oak Street”), and request that all pleadings filed and notices given in this case be given and served to the following:

KIRKLAND & ELLIS LLP

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-and-

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¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at www.kccllc.net/mountainexpressoil. The location of Debtor Mountain Express Oil Company’s principal place of business and the Debtors’ service address in these Chapter 11 cases is 3650 Mansell Road, Suite 250, Alpharetta, GA 30022.

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Co-Counsel to Oak Street Real Estate Capital, LLC

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and pleadings, but also includes, without limitation, notices of any pleadings, complaint, demand, hearing, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise filed with regard to the above-referenced chapter 11 cases.

PLEASE TAKE FURTHER NOTICE that neither this Amended Notice of Appearance and Request for Service of Notice and Pleadings nor any subsequent appearance, pleading, claim, proof of claim, document, suit, or motion, nor any other writing or conduct, should be taken to constitute a waiver of any right of Oak Street: (i) to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge; (ii) to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy, or proceeding related hereto, notwithstanding whether or not such matters are designated as “core proceedings” pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial is pursuant to statute or the United States Constitution; (iii) to have the reference withdrawn by the United States District Court for the Southern District of Texas in any matter or proceeding subject to mandatory or discretionary withdrawal; and (iv) to rights, claim, actions, or defenses, setoffs, recoupments or other matters to which Oak Street is entitled under any agreements or at law or in equity or under the United States Constitution.

Respectfully Submitted,

Houston, Texas
April 3, 2023

/s/ John F. Higgins
John F. Higgins

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Co-Counsel to Oak Street Real Estate Capital, LLC

Certificate of Service

I certify that on April 3, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ John F. Higgins

John F. Higgins